

EXHIBIT A

From: [Robinson, Amy \(LAW\)](#)
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Subject: Deposition Schedule
Date: Friday, January 21, 2022 6:53:35 PM
Attachments: [Deposition Schedule_1-21-22.pdf](#)
[Deposition Topic List_1-21-22.pdf](#)

Counsel,

Please see attached deposition schedule and chart of witnesses per topic.

First, given the 2-day requirement for many witnesses, we cannot fit into the schedule all of the witnesses before the April 22nd deadline without double and triple tracking, which we know plaintiffs want to avoid. Both sides need an extension of the deadline.

Second, we are seeking to designate one of the fact witnesses as a 30(b)(6) witness, but this witness is retired, and we were not able to confirm their consent to be so designated by today. We expect to have that confirmation shortly.

Regards,

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From: Amy Robinson <arobinson58@nyc.rr.com>
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Deposition Schedule_1-21-22
Deposition Topic List_1-21-22

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**IN RE: NEW YORK CITY POLICING SUMMER 2020 DEMONSTRATIONS
HIGH-RANKING/30(b)(6) DEPOSITION SCHEDULE**

DEPONENT	DEPOSITION DATE(S)
Thomas Galati—Chief of Intelligence Bureau ¹	February 3 February 4
Christopher Czark, Lieutenant, CJB	February 8
Gerard Dowling—Deputy Chief, Former Executive Officer—SRG	February 10 February 11
Dep. Comm'r John Miller	February 16
Dermot Shea—Former Police Commissioner	February 17 February 18
Benjamin Tucker—1 st Deputy Commissioner	February 25
Teresa Shortell—Former Assistant Chief, Training	March 2
Stephen Hughes—Assistant Chief PBMS	March 3 March 4
Kathleen O'Reilly—Assistant Chief PBMN	March 8
Terrence Monahan—Former Chief of Department	March 10 March 11
David Miller, Captain—Commanding Officer, DCU	March 17 March 18
John D'Adamo—Deputy Chief, Commanding Officer—SRG	March 23
Jeffrey Maddrey—Assistant Chief—PBBN	March 24
James Khan—Sergeant, IAB	March 25
Robert Gallitelli—Deputy Inspector, 40 th Precinct	March 30
Harry Wedin—Assistant Chief, Special Operations	March 31
Marcos Carrion, Former Comm'r Community Affairs Unit, OTM	April 5
Kenneth Corey—Assistant Chief—PBSI	April 6
Donna Jones—Assistant Chief, CJB	April 6

¹ Officers in red are 30(b)(6) witnesses.

Kenneth Lehr—Assistant Chief PBBX	April 7
Richard Esposito—Deputy Comm’r Strategic Communications	April 12
Dean Fuleihan—1 st Deputy Mayor	April 12
Carrie Talansky—Assistant Commissioner, Legal Bureau	April 13
Joseph Taylor—Captain, Commanding Officer, SRG 3	April 14
Edward Mullane—Former Chief of Operations Division	April 14
Kenneth Rice—Sergeant, Legal Bureau	April 20
Juanita Holmes—Chief of Patrol	April 21
Joseph Resnick—Director, IAB	April 21
Katherine Obanhein—Agency Attorney, Legal Bureau	April 22
Former Mayor, Bill de Blasio	
Michael Baker, Deputy Chief, OMAP	
John Kanganis—Deputy Inspector	
Lt. Lauren Foster	
Elias Nikas—Deputy Inspector	
Jason Hagestad—Captain, 78 th Precinct	
Jeffrey Schlanger—Executive Agency Counsel—RMB (Ret.)	
Michael Cody—Inspector, PBMN	
Elizabeth Daitz—Exec. Director of Strategic Initiatives	
John Cappelmann—Deputy Chief, CO OMAP (Ret.)	
Rodney Harrison—Former Chief of Department	

**IN RE: NEW YORK CITY POLICING SUMMER 2020 DEMONSTRATIONS
HIGH-RANKING/30(b)(6) DEPOSITION TOPICS**

TOPIC	WITNESS
1	Michael Baker
6	Stephen Hughes
7	Dean Fuleihan
8	Various Identified 30(b)(6) Witnesses
9	Gerard Dowling/David Miller/Carrie Talansky
10	Gerard Dowling/David Miller
11	James Khan
12	Thomas Galati
13	Edward Mullane/Gerard Dowling/Carrie Talansky
14	Carrie Talansky/Christopher Czark
15	Carrie Talansky/Stephen Hughes
16	Gerard Dowling/David Miller
17	Lauren Foster
18	Lauren Foster
19	Michael Baker
20	John Kanganis
21	John Kanganis
22	Michael Baker